



*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

September 7, 2022

VIA ECF

The Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

**Re: *United States v. Sung Kook (Bill) Hwang, et al.*,
22 Cr. 240 (AKH)**

Dear Judge Hellerstein:

The Government respectfully writes in advance of the September 8, 2022, conference to inform the Court that the parties have conferred about a proposed motion schedule in this matter. Based on conversations and correspondence between the parties, the Government understands the following briefing schedule would be acceptable to all parties:

- Defense motion papers to be filed no later than December 2, 2022;
- Government opposition briefs to be filed no later than January 12, 2023; and
- Defense replies to be filed no later than February 2, 2023.

At tomorrow's conference, the Government will respectfully request that the Court adopt the parties' proposed motion briefing schedule.

In addition, the Government tomorrow will respectfully request that the Court set a trial date. Because a trial in this matter may last approximately two months, setting a trial date now would allow all parties to immediately arrange for the availability of trial teams, experts, and witnesses; permit the Court to reserve the time in its own schedule; and enable the public and the

parties to avoid unnecessary delay in obtaining a jury's verdict in this matter. The Government understands that the defendants oppose the setting of any trial date until the Court resolves the motions the defense intends to file.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: 

Alex Rossmiller
Matthew Podolsky
Andrew Thomas
Assistant United States Attorneys
Tel.: (212) 637-2415/-1947/-2106